

## EXHIBIT 2

**IN THE UNITED STATES DISTRICT COURT  
FOR NORTHERN DISTRICT OF OHIO**

THE NOCO COMPANY,	)	CASE NO. 1:20-CV-02322-SO
	)	
Plaintiff,	)	JUDGE SOLOMON OLIVER
	)	
v.	)	
	)	
AUKEY TECHNOLOGY CO., LTD., et al.,	)	
	)	
Defendants.	)	
	)	

**DECLARATION OF DIEGO F. FREIRE IN SUPPORT OF DEFENDANTS’  
OPPOSITION TO NOCO’S PRELIMINARY INJUNCTION MOTION**

1. I, Diego F. Freire, am more than twenty-one years of age, am competent to present this Declaration, and have personal knowledge of the facts set forth herein. I could and would testify under oath to the matters set forth herein if called to do so.

2. This declaration is submitted in support of Defendant’s Opposition to NOCO’s Preliminary Injunction Motion.

3. I am an attorney in good standing with the Bar of the State of Illinois. I am an Associate in the law firm Arch & Lake LLP, 203 N. LaSalle St., Suite 2100, Chicago, IL 60601.

4. Attached as Exhibit A is a true and correct copy of the results of a search conducted on the TESS database of the U.S. Patent and Trademark Office on December 18, 2020 for the Trademark “TACKLIFE.”

5. Attached as Exhibit B is a true and correct copy of the results of a search conducted on the Amazon Marketplace on December 18, 2020 for “TACKLIFE” products.

6. Attached as Exhibit C is a true and correct copy of the results of a search of the PACER database conducted on December 18, 2020 showing the cases filed by NOCO in this judicial district between the years 2015 and 2020.

7. Attached as Exhibit D is a true and correct copy of an email message sent from Michael J. Garvin (counsel for NOCO in the patent infringement cases it has filed against Aukey and others) to Peter J. Curtin, et al. dated December 5, 2020. Exhibit D also includes a true and correct copy of an email from Peter J. Curtin to Michael J. Garvin, et al. dated November 30, 2020. This is the message to which Mr. Garvin responded to in his December 5<sup>th</sup> email and is provided for context.

I declare under the penalty of perjury that the foregoing is true and correct.

This the 18<sup>th</sup> day of December, 2020.

/s/ Diego F. Freire

Diego F. Freire

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